

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LOREN M. RIDINGER, individually and on
behalf of the Estate of James Ridinger,

Plaintiff,

-against-

RALPH K. STONE, RACHEL L. GOULD and
MEISTER SEELIG & FEIN LLP,

Defendants.
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22-cv-09082-VM

**DECLARATION OF LISA L.
SHREWSBERRY IN
SUPPORT OF MOTION TO
DISMISS THE FIRST
AMENDED COMPLAINT**

Lisa L. Shrewsberry, an attorney duly admitted to practice before the United States
District Court for the Southern District of New York, declares pursuant to 28 U.S.C. §1746:

1. I am a partner in the law firm of Traub Lieberman Straus & Shrewsberry LLP, attorneys for Defendants Ralph K. Stone, Rachel L. Gould and Meister Seelig & Fein LLP. I submit this declaration in support of the motion to dismiss the first amended complaint on behalf of such defendants, pursuant to Federal Rule of Civil Procedure 12(b)(6).

2. Plaintiff filed a first amended complaint on or about January 20, 2023 against Ralph K. Stone, Rachel L. Gould and Meister Seelig & Fein LLP, in the United States District Court for the Southern District of New York, a true and correct copy is annexed hereto Exhibit “A.”

3. A true and correct copy of the Yacht Appraisal Report of Utopia II, dated March 16, 2016, is annexed hereto as Exhibit “B.”

4. A true and correct copy of the Fiscal Sponsorship Agreement between Veterans Inc. and Killer Impact, Inc. dated April 20, 2016, is annexed hereto as Exhibit “C.”

5. A true and correct copy of the 2016 Fiscal Sponsorship Annual Report of Killer Impact is annexed hereto as Exhibit “D.”

6. A true and correct copy of the promissory notes by RR Skye Holdings, LLC to Veterans Inc. in the aggregate amount of \$4.93 million, dated May 14, 2016, are annexed hereto as Exhibit “E.”

7. A true and correct copy of the promissory note by RR Skye Holdings, LLC to Market America, Inc. in the amount of \$500,0000, dated May 10, 2016, is annexed hereto as Exhibit “F.”

8. True and correct copies of the Notices of Deficiency issued by the IRS To James Ridinger and Loren Ridinger, dated June 23, 2021, which are annexed as Exhibits to the plaintiff’s petition in *Ridinger v. Commissioner of Internal Revenue*, in the United States Tax Court under Index no. 23083-21, are annexed hereto as Exhibit “G.”

9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: Hawthorne, New York
February 3, 2023

**TRAUB LIEBERMAN STRAUS &
SHREWSBERRY LLP**

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